UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN

Jennifer A. Hadsall, Regional Director of Region 18 of the National Labor Relations Board, for and on behalf of the NATIONAL LABOR RELATIONS BOARD,	
Petitioner v.	Civil No. 20-CV-181-JPS
SUNBELT RENTALS, INC.,	
Respondent	

CIVIL L.R. 7(h) EXPEDITED NON-DISPOSITIVE MOTION: MOTION FOR LEAVE TO FILE OVERLENGTH REPLY MEMORANDUM

By this Motion filed pursuant to Civil L.R. 7(h), Petitioner moves this Court to grant Petitioner leave to file an overlength reply memorandum, not to exceed thirty (30) pages, in support of its Petition, due on March 12, 2020.

Petitioner has filed a petition for injunctive relief pursuant to Section 10(j) of the National Labor Relations Act (Petition). 29 U.S.C. § 160(j). The underlying administrative record, which the Court will be relying on in considering the Petition, contains several thousand pages of testimony and exhibits. As the underlying record had not closed at the time of the filing of the initial Petition, this is Petitioner's first and only opportunity to brief the matter with the benefit of a full administrative record. Further, while the allegations before the Court rely on well-settled Board precedent, they are numerous and, in certain instances, require consideration of a large volume of this record evidence. Finally, in addition to briefing the likelihood of success on the merits, Petitioner will also be addressing why injunctive relief is appropriate in light of these allegations and responding, where necessary, to arguments raised by Respondent.

In order to fully frame and address the issues before the Court, Petitioner requests permission to file a memorandum in excess of the Court's limit of fifteen pages for reply briefing. Petitioner respectfully requests that it be allowed to file a memorandum up to thirty pages in length and asserts that it will make its best effort to limit its brief to fewer pages than the amount requested.1

Dated: March 2, 2020.

Respectfully submitted,

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¹ The undersigned conferred with counsel for Respondent and Respondent does not object to this Motion.